



HAGENS BERMAN

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November 21, 2022

**VIA ECF**

Hon. Valerie Figueredo  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Bookends & Beginnings LLC v. Amazon, et al.*,  
Case No. 21-cv-02584-GHW-VF (S.D.N.Y.)

Dear Magistrate Judge Figueredo:

Plaintiff submits this letter seeking leave to file portions of Plaintiff's Second Amended Complaint ("SAC") under seal. The SAC quotes from and includes substantial discussion of the Big Five Publisher Defendants'<sup>1</sup> confidential agreements relating to the sale of their print books to Defendant Amazon. Plaintiff seeks leave to seal consistent with the Court's prior sealing orders. *See* ECF Nos. 84, 120, 148. The Defendants consented to the motion and provided the proposed redactions.

Plaintiff therefore requests leave to file portions of the SAC under seal and will file a redacted version on ECF.

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<sup>1</sup> Hachette Book Group, Inc.; HarperCollins Publishers L.L.C.; Macmillan Publishing Group, LLC; Penguin Random House LLC; and Simon & Schuster, Inc.

**MEMO ENDORSED**

HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE

Dated: 11-22-2022

For the reasons stated at ECF No. 148, Plaintiff's motion to seal is GRANTED. The Clerk of Court is directed to terminate the motion at ECF No. 162. SO ORDERED.

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Sincerely,

HAGENS BERMAN SOBOL SHAPIRO LLP

A handwritten signature in blue ink, appearing to read "Steve W. Berman", with a long, sweeping horizontal stroke extending to the right.

Steve W. Berman

cc: All Counsel of Record (via ECF)